

ORIGINAL

AKIN, GUMP, STRAUSS, HAUER & FELD, L.L.P.
ATTORNEYS AT LAW

AUSTIN
BRUSSELS
DALLAS
HOUSTON
LONDON
LOS ANGELES
MOSCOW
NEW YORK
PHILADELPHIA
SAN ANTONIO
WASHINGTON

A REGISTERED LIMITED LIABILITY PARTNERSHIP
INCLUDING PROFESSIONAL CORPORATIONS
1333 NEW HAMPSHIRE AVENUE, N.W.

SUITE 400
WASHINGTON, D.C. 20036

(202) 887-4000
FAX (202) 887-4288
www.akingump.com

WRITER'S DIRECT DIAL NUMBER (202) 887-4011
WRITER'S E-MAIL ADDRESS tdavidson@akingump.com

RECEIVED

SEP 27 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

September 27, 1999

BY HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554


Re: Comments of KNTV License, Inc.
NPRM to Reallocate DTV Channel for Station KSBW, Salinas, CA
MM Docket No. 99-269

Dear Ms. Salas:

Enclosed for filing on behalf of KNTV License, Inc. ("KNTV") are an original and four copies of comments that KNTV wishes to submit in the above-referenced proceeding. Any questions or comments concerning this matter should be addressed to the undersigned.

Very truly yours,



Tom W. Davidson, Esq. 

Enclosures

No. of Copies rec'd
List ABCDE



**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

RECEIVED

SEP 27 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Section 73.622(b))	MM Docket No. 99-269
Table of Allotments)	RM-9698
Digital Television Broadcast Stations)	
(Salinas, California))	

To: Chief, Video Services Division

COMMENTS OF KNTV LICENSE, INC.

KNTV License, Inc. ("KNTV License"), licensee of Station KNTV(TV), San Jose, California (the "Station"), by its attorneys, hereby submits these comments in the above-captioned rulemaking proceeding. Hearst-Argyle Stations, Inc. ("Hearst-Argyle"), licensee of Station KSBW(TV), Salinas, California, has requested that the Mass Media Bureau ("Bureau") of the Federal Communications Commission ("FCC" or "Commission") change the digital television ("DTV") channel allotted to Station KSBW(TV) from channel 43 to channel 10.¹ To facilitate this channel substitution, the Bureau has initiated the above-captioned rulemaking proceeding requesting comments on the proposed amendment of the Digital Table of Allotments to reallocate DTV channel 10 to Station KSBW(TV) at Salinas, California.

KNTV License is assigned to operate on NTSC channel 11. KNTV License does not object to Hearst-Argyle's request to change the digital channel assignment for Station KSBW from 43 to 10. However, the Bureau must take note of the fact that on September 23, 1999, KNTV License filed an application with the Commission requesting authorization to modify

¹ Station KSBW currently operates on NTSC channel 8, Salinas, California.

KNTV's licensed NTSC facilities by increasing the Station's peak visual effective radiated power from 79.4 kW to 181.5 kW.² The proposed power increase represents the maximum allowable power at Station KNTV's effective tower height of 844 meters.

KNTV License is bringing its modification application to the attention of the Bureau to ensure that any digital channel reallocation granted to Station KSBW in this rulemaking proceeding is evaluated in light of, and taking into account, the technical changes requested in Station KNTV's pending minor modification application.³ Accordingly, if Station KSBW's DT channel is reallocated from channel 43 to 10, the Bureau needs to ensure that the new KSBW-DT terrain-limited, interference-free baseline population reflects the higher power operation of Station KNTV's modified facilities.

Based on the foregoing, KNTV License does not oppose the digital channel reallocation requested by Hearst-Argyle for Station KSBW. However, a reallocation of KSBW's digital

² A date-stamped copy of the FCC Form 301 application seeking this modification is attached as Exhibit A.

³ The power increase requested in Station KNTV's modification application represents a minor change and complies with all applicable technical requirements set forth in the Commission's rules.

channel to 10 must take into account and be examined assuming the operation of Station KNTV on NTSC channel 11 with the technical parameters specified in the modification application that KNTV License filed on September 23, 1999.

Respectfully submitted,

KNTV LICENSE, INC.

By: 

Tom W. Davidson, Esq.
Paige S. Anderson, Esq.
Its Attorneys

AKIN, GUMP, STRAUSS, HAUER & FELD, LLP
1333 New Hampshire Avenue, N.W.
Suite 400
Washington, D.C. 20036
202/887-4000

Date: September 27, 1999

EXHIBIT A

RECEIPT

AKIN, GUMP, STRAUSS, HAUER & FELD, L.L.P.

ATTORNEYS AT LAW

AUSTIN
BRUSSELS
DALLAS
HOUSTON
LONDON
LOS ANGELES
MOSCOW
NEW YORK
PHILADELPHIA
SAN ANTONIO
WASHINGTON

A REGISTERED LIMITED LIABILITY PARTNERSHIP
INCLUDING PROFESSIONAL CORPORATIONS

1333 NEW HAMPSHIRE AVENUE, N.W.

SUITE 400

WASHINGTON, D.C. 20036

(202) 887-4000

FAX (202) 887-4288

www.akingump.com

WRITER'S DIRECT DIAL NUMBER (202) 887-4011

WRITER'S E-MAIL ADDRESS: tdavidson@akingump.com

September 23, 1999

VIA COURIER

Federal Communications Commission
Mass Media Services
P.O. Box 358165
Pittsburgh, PA 15251-5165

FCC/MELLON
SEP 23 1999

Re: KNTV License, Inc.
Minor Change Application
Station KNTV(TV), San Jose, California

Dear Sir or Madam:

Enclosed on behalf of KNTV License, Inc., licensee of Station KNTV, San Jose, California (the "Station"), are an original and two copies of an application on Federal Communications Commission ("FCC" or "Commission") Form 301 for a minor change to the facilities of Station KNTV. The enclosed application seeks FCC authorization to increase the Station's peak visual effective radiated power from 79.4 kW to 181.5 kW.

Please direct any inquiries regarding this matter to the undersigned.

Very truly yours,


Tom W. Davidson, Esq.

Enclosures

cc: Mr. David Bennett, Mass Media Bureau
Mr. Kevin Harding, Mass Media Bureau

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

APPROVED BY OMB 3060-0689

(1) LOCKBOX # 358165

PAGE NO 1 OF 1

SPECIAL USE

FCC USE ONLY

SECTION A - PAYER INFORMATION

(2) PAYER NAME (If paying by credit card, enter name exactly as it appears on your card)

KNTV License, Inc.

(3) TOTAL AMOUNT PAID (dollars and cents)

\$ 725.00

(4) STREET ADDRESS LINE NO. 1

c/o Granite Broadcasting Corporation

(5) STREET ADDRESS LINE NO. 2

767 Third Avenue, 34th Floor

(6) CITY

New York

(7) STATE

NY

(8) ZIP CODE

10017

(9) DAYTIME TELEPHONE NUMBER (include area code)

(212) 826-2530

(10) COUNTRY CODE (if not in U.S.A.)

IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C)

SECTION B - APPLICANT INFORMATION

(11) APPLICANT NAME (If paying by credit card, enter name exactly as it appears on your card)

(12) STREET ADDRESS LINE NO. 1

(13) STREET ADDRESS LINE NO. 2

(14) CITY

(15) STATE

(16) ZIP CODE

(17) DAYTIME TELEPHONE NUMBER (include area code)

(18) COUNTRY CODE (if not in U.S.A.)

COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEETS (FORM 159-C)

SECTION C - PAYMENT INFORMATION

(19A) FCC CALL SIGN/OTHER ID

KNTV

(20A) PAYMENT TYPE CODE (PTC)

M P T

(21A) QUANTITY

1

(22A) FEE DUE FOR (PTC) IN BLOCK 20A

725.00

FCC USE ONLY

(23A) FCC CODE 1

(24A) FCC CODE 2

(19B) FCC CALL SIGN/OTHER ID

(20B) PAYMENT TYPE CODE (PTC)

(21B) QUANTITY

(22B) FEE DUE FOR (PTC) IN BLOCK 20B

FCC USE ONLY

(23B) FCC CODE 1

(24B) FCC CODE 2

(19C) FCC CALL SIGN/OTHER ID

(20C) PAYMENT TYPE CODE (PTC)

(21C) QUANTITY

(22C) FEE DUE FOR (PTC) IN BLOCK 20C

FCC USE ONLY

(23C) FCC CODE 1

(24C) FCC CODE 2

(19D) FCC CALL SIGN/OTHER ID

(20D) PAYMENT TYPE CODE (PTC)

(21D) QUANTITY

(22D) FEE DUE FOR (PTC) IN BLOCK 20D

FCC USE ONLY

(23D) FCC CODE 1

(24D) FCC CODE 2

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(25)

PAYER TIN

0 1 3 3 4 5 8 7 8 2

(26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN A-2

APPLICANT TIN

0

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT

I, Lawrence I. Wills

(PRINT NAME)

Certify under penalty of perjury that the foregoing and supporting information are true and correct to the best of my knowledge, information and belief.

SIGNATURE

Lawrence I. Wills

SECTION F - CREDIT CARD PAYMENT INFORMATION

(28)

MASTERCARD/VISA ACCOUNT NUMBER

EXPIRATION DATE

MASTERCARD

1 2 3 4 5 6 7 8 9 0

MONTH YEAR

VISA

I hereby authorize the FCC to charge my VISA or MASTERCARD for the service(s)/authorization(s) herein described.

AUTHORIZED SIGNATURE

DATE

FOR
FCC
USE
ONLY

FCC 301

APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION

FOR COMMISSION USE ONLY
FILE NO.

Section I - General Information

1. Legal Name of the Applicant		
KNTV License, Inc.		
Mailing Address		
c/o Granite Broadcasting Corporation, 767 Third Avenue		
City	State or Country (if foreign address)	ZIP Code
New York	New York	10017
Telephone Number (include area code)	E-Mail Address (if available)	
(212) 826-2530		
Call Sign	Facility ID Number	
KNTV	35280	

2. Contact Representative (if other than applicant)	Firm or Company Name
N/A	
Telephone Number (include area code)	E-Mail Address (if available)

3. If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114):

☐ Governmental Entity ☐ Other _____

4. Application Purpose.

- | | |
|---|--|
| <input type="checkbox"/> New station | <input type="checkbox"/> Major Modification of construction permit |
| <input type="checkbox"/> Major Change in licensed facility | <input type="checkbox"/> Minor Modification of construction permit |
| <input checked="" type="checkbox"/> Minor Change in licensed facility | <input type="checkbox"/> Major Amendment to pending application |
| | <input type="checkbox"/> Minor Amendment to pending application |

a. File number of original construction permit: _____ ☒ N/A

b. Service Type: ☐ AM ☐ FM ☒ TV ☐ DTV

c. Community of License:

City	State
San Jose	CA

d. Facility Type: ☒ Main ☐ Auxiliary

If an amendment, submit as an Exhibit a listing by Section and Question Number of the portions of the pending application that are being revised.

Exhibit No.
N/A

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

Section II - Legal

1. **Certification.** Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets. ☒ Yes ☐ No

2. **Parties to the Application.**

- a. List the applicant, and, if other than a natural person, its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. Create a separate row for each individual or entity. Attach additional pages if necessary.

- | | |
|--|---|
| <p>(1) Name and address of the applicant and, if applicable, its officers, directors, stockholders, or partners (if other than individual also show name, address and citizenship of natural person authorized to vote the stock). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and partners.</p> | <p>(2) Citizenship.
(3) Positional Interest: Officer, director, general partner, limited partner, LLC member, etc.
(4) Percentage of votes.
(5) Percentage of equity.</p> |
|--|---|

(1)	(2)	(3)	(4)	(5)
N/A				

- b. Applicant certifies that equity interests not set forth above are non-attributable.

☐ Yes ☐ No

☒ N/A

See Explanation
in Exhibit No.

3. **Other Authorizations.** List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest.

Exhibit No.

☒ N/A

4. **Multiple Ownership.**

- a. Applicant certifies that the proposed facility:

1. complies with the Commission's multiple and cross-ownership rules;
2. does not present an issue under the Commission's cross-interest policy;
3. does not present an issue under the Commission's policies relating to media interests of immediate family members;
4. complies with the Commission's policies relating to future ownership interests; and
5. complies with the Commission's restrictions relating to the insulation and non-participation of non-party investors and creditors.

☐ Yes ☐ No

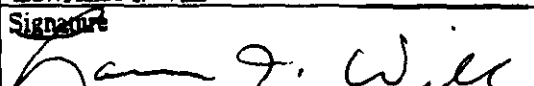
N/A

See Explanation
in Exhibit No.

Section II - Legal

- b. **Radio Applicants Only.** If the grant of the application would result in certain principal community service contour overlaps, see Local Radio Ownership Worksheet, Question 1, applicant certifies that all relevant information has been placed in public inspection file(s) and submitted to the Commission. ☐ Yes ☐ No ☒ N/A See Explanation in Exhibit No.
5. **Character Issues.** Applicant certifies that neither applicant nor any party to the application has or has had any interest in, or connection with: ☐ Yes ☐ No See Explanation in Exhibit No.
- a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or N/A
- b. any pending broadcast application in which character issues have been raised.
6. **Adverse Findings.** Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination. ☐ Yes ☐ No See Explanation in Exhibit No.
7. **Alien Ownership and Control.** Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments. ☐ Yes ☐ No See Explanation in Exhibit No.
8. **Program Service Certification.** Applicant certifies that it is cognizant of and will comply with its obligations as a Commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area. ☐ Yes ☐ No N/A
9. **Local Public Notice.** Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580. ☐ Yes ☐ No N/A
10. **Auction Authorization.** If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable. ☐ Yes ☐ No ☒ N/A
- Exhibit No.
11. **Anti-Drug Abuse Act Certification.** Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862. ☒ Yes ☐ No

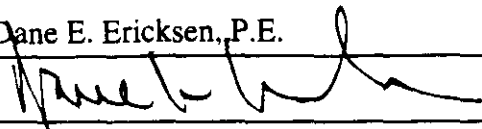
I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing Lawrence I. Wills	Typed or Printed Title of Person Signing Vice President, KNTV License, Inc.
Signature 	Date September 22, 1999

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT
 (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT
 (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Dane E. Ericksen, P.E.	Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer	
Signature 	Date September 21, 1999	
Mailing Address Hammett & Edison, Inc., Consulting Engineers Box 280068		
City San Francisco	State or Country (if foreign address) California	ZIP Code 94128
Telephone Number (include area code) 707/996-5200	E-Mail Address (if available) dericksen@h-e.com	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT
(U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT
(U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).



SECTION III-C TV Engineering

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Channel Number: 11
2. Offset: Plus ☒ Minus _____ Zero _____
3. Zone: ☐ I ☒ II ☐ III
4. Antenna Location Coordinates: (NAD 27)
- | | | | | | |
|--------------|-------------|-------------|---------------------------------------|---------------------------------------|-----------|
| <u>37</u> ° | <u>06</u> ' | <u>40</u> " | <input checked="" type="checkbox"/> N | <input type="checkbox"/> S | Latitude |
| <u>121</u> ° | <u>50</u> ' | <u>34</u> " | <input type="checkbox"/> E | <input checked="" type="checkbox"/> W | Longitude |
5. Antenna Structure Registration Number: 1015138
- ☐ Not applicable ☒ FAA Notification Filed with FAA
6. Height of Radiation Center Above Mean Sea Level: 1,235 meters
7. Overall Tower Height Above Ground Level: 90 meters
8. Height of Radiation Center Above Ground Level: 81 meters
9. Height of Radiation Center Above Average Terrain: 844 meters
10. Maximum Effective Radiated Power (ERP): 181.5 kW
11. Antenna Specifications:
- | | | | |
|--------------|--------|-------|---------------|
| Manufacturer | Andrew | Model | ATW9V9-HTO-11 |
|--------------|--------|-------|---------------|
- a. ☐ Not Applicable
- b. Electrical Beam Tilt: 2.25 degrees ☐ Not Applicable
- c. Mechanical Beam Tilt: _____ degrees toward azimuth _____ degrees True ☒ Not Applicable
- Attach as an Exhibit all data specified in 47 C.F.R. Section 73.685.
- | |
|--------------------|
| Exhibit No.
E-1 |
|--------------------|
- d. Polarization: ☒ Horizontal ☐ Circular ☐ Elliptical

TECH BOX

e. Directional Antenna Relative Field Values: ☒ Not applicable (Nondirectional)

Rotation: _____ ° ☐ No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0		60		120		180		240		300	
10		70		130		190		250		310	
20		80		140		200		260		320	
30		90		150		210		270		330	
40		100		160		220		280		340	
50		110		170		230		290		350	
Additional Azimuths											

If a directional antenna is proposed, the requirements of 47 C.F.R. Sections 73.682(a)(14) and 73.685 must be satisfied. **Exhibit required.**

Exhibit No.
E-1

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

CERTIFICATION

12. **Allotment.** The proposed facility complies with 47 C.F.R. Section 73.607. ☒ Yes ☐ No See Explanation in Exhibit No.
13. **Power and Antenna Height.** The proposed facility complies with 47 C.F.R. Section 73.614. ☒ Yes ☐ No See Explanation in Exhibit No.
14. **Community Coverage.** The proposed facility complies with 47 C.F.R. Sections 73.685(a) and (b). ☒ Yes ☐ No See Explanation in Exhibit No.
15. **Main Studio Location.** The proposed main studio location complies with 47 C.F.R. Section 73.1125. ☒ Yes ☐ No See Explanation in Exhibit No.

16. **Separation Requirements.** The proposed facility complies with the separation requirements 47 C.F.R. Section 73.610. ☒ Yes ☐ No

See Explanation in Exhibit No.

17. **Objectionable Interference.** The applicant accepts full responsibility in accordance with 47 C.F.R. Sections 73.685(d) and (g) for the elimination of any objectionable interference (including that caused by intermodulation) to facilities in existence or authorized prior to the grant of this application. ☒ Yes ☐ No

See Explanation in Exhibit No.

18. **Environmental Protection Act.** The proposed facility is excluded from environmental processing under 47 C.F.R. Section 1.1306 (*i.e.*, the facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). ☒ Yes ☐ No

See Explanation in Exhibit No.

Exhibit No. E-2

If "Yes," submit as an Exhibit a brief explanation of why an Environmental Assessment is not required. Also describe therein the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

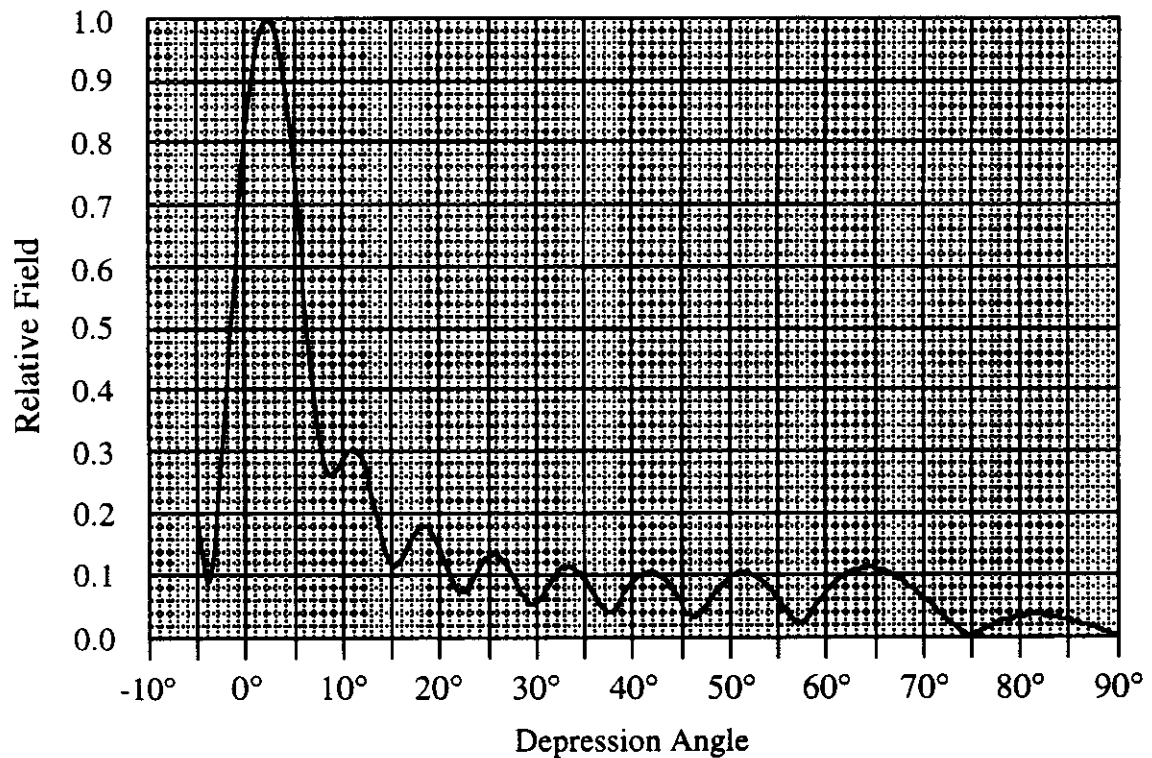
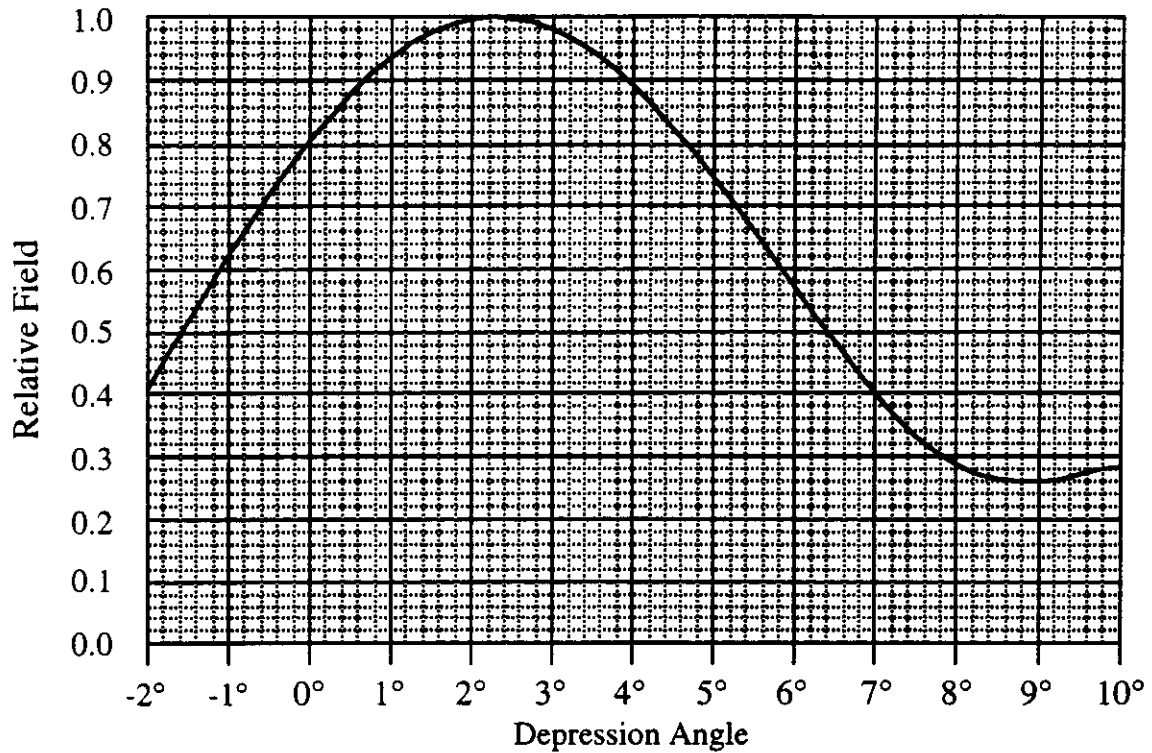
By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

If "No," submit as an Exhibit an Environmental Assessment required by 47 C.F.R. Section 1.1311.

PREPARER'S CERTIFICATION IN SECTION III MUST BE COMPLETED AND SIGNED.

TV Station KNTV • NTSC Channel 11 • San Jose, California

Antenna Elevation Pattern - Andrew ATW9V9-HTO-11



Although the FCC Rules request submission of the elevation plane patterns in dBk, it has been Commission policy not to require this duplicative information, and it is not included here. These patterns can, of course, be provided upon request.



HAMMETT & EDISON, INC.
CONSULTING ENGINEERS
SAN FRANCISCO

990920
Exhibit E-1

TV Station KNTV • NTSC Channel 11 • San Jose, California

Environmental Considerations (Question 18)

Grant of this application is not considered to be a major environmental action as defined by Section 1.1307 of the FCC Rules. The proposed transmitting antenna is an existing antenna on an existing tower at an established radio communications site.

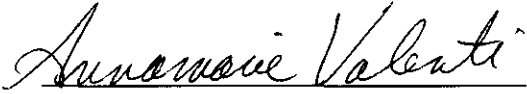
The proposed operation would comply with the FCC guidelines limiting human exposure to radio frequency energy. Calculations performed in accordance with FCC OET Bulletin No. 65 (August 1997) show a worst-case ground level power density due to the KNTV operation of 0.5% of the NCRP occupational limit (2.5% of the NCRP public limit) at a calculation height of 1.8 meters above the ground. Accordingly, the proposed facility is categorically excluded by Section 1.1307(b) of the FCC Rules from having to consider the contributions of other stations at the site.

CERTIFICATE OF SERVICE

I, Annamarie Valenti, an employee of Akin, Gump, Strauss, Hauer & Feld, L.L.P., certify that a copy of the foregoing **Comments of KNTV License, Inc.** was served by U.S. First-Class mail, postage prepaid on this 27th of September, 1999, upon the following, on behalf of KNTV License, Inc.:

Mark J. Prak, Esq.
Brooks, Pierce, McLendon
Humphrey & Leonard, L.L.P.
Post Office Box 1800
Raleigh, North Carolina 27602
(Counsel for Hearst-Argyle
Stations, Inc.)

Barbara Kreisman*
Chief, Video Services Division
Mass Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Portals II Building, Room 2-A-666
Washington, D.C. 20554


Annamarie Valenti

* Hand Delivery